Boundary Timber Supply Area
Timber Supply Review

Summary of Public Input

BC Ministry of Forests
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This is a summary of the public input received on the Timber Supply Review in the Boundary Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

104-01767/

Boundary Timber Supply Area

Background

As part of the review of timber supply in the Boundary Timber Supply Area (TSA), two opportunities were provided for public input. The first followed release of the Boundary Timber Supply Area *Data Package* and *Information Report* in September 1999. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Boundary TSA. A 30-day review period, ending October 15, 1999, was provided for the public to comment on these documents.

On November 23, 2000 the British Columbia Forest Service released the *2000 Boundary Timber Supply Area Analysis Report* and *Public Discussion Paper*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the 60-day review period that ended January 29, 2001.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut (AAC) for the Boundary TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Boundary Forest District office.

Public Review Process and Response

Boundary District staff actively solicited public input on the Timber Supply Review in the Boundary TSA through the following actions:

- newspaper advertisements were placed, advising of the availability of all documents for review by the public.
- copies of all the documents were made available to the local media.
- about 24 copies of the news release and *Information Report* were mailed to key stakeholders in the TSA.
- the *Data Package* and the *Boundary Timber Supply Area Analysis Report* were available at the district office.
- the Timber Supply Review documents were discussed with the local MLA.
- follow-up telephone calls were made to First Nations regarding the mailing.
- 40 copies of the *Analysis Report* and *Public Discussion Paper* were mailed to key stakeholders in the TSA, such as First Nations, licensees, local environmental groups and local governments. Meetings or presentations were offered.
- about 200 copies of the *Public Discussion Paper* were mailed to stakeholders in the Boundary area.

Two groups requested presentations on the Timber Supply Review. On November 23, 2000 Boundary District staff met with three representatives from Pope and Talbot, and on January 13, 2001 staff attended a general meeting of woodlot licensees with 29 people in attendance.

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The Boundary Forest District also received ten written submissions on the *Data Package* and 164 submissions on the *Analysis Report* (see Appendix 1).

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the Boundary TSA is summarized under the following headings:

- Data Package (and Information Report);
- Timber Supply Area Analysis Report (and Public Discussion Paper);
- Other comments.

Data Package

Size of the Harvesting Land Base

One submission says the use of the 1991 operability study seems reasonable, while two others question whether the difficult terrain that is contributing to timber supply is in fact being harvested.

The joint submission from the Granby Wilderness Society and the Friends of the Granby Environmental Society (the "joint submission") questions why terrain stability mapping was not incorporated in the analysis. The groups say mapping was used in most other TSAs and is more reliable than using environmentally sensitive areas for fragile or unstable soils. They also say areas with significantly fragile or unstable soils (E2s) within high value fish stream watersheds and other domestic watersheds should be treated as they are in community watersheds (i.e., a 50-percent area reduction).

The joint submission also expresses concern about potential mistyping of some high elevation sites that likely have low productivity. They recommend removing from the timber harvesting land base (THLB) areas labelled alpine with a forest type as well as those labelled alpine, or the removal of stands mapped as parkland or alpine tundra.

Pope and Talbot (P&T) questions why woodlots are excluded from the analysis and says the AAC associated with them should be an output of, not an input to, the analysis.

The joint submission says, given present controversies over First Nations' land and timber rights, not adjusting the land base for this factor is unrealistic. An individual submission questions why Granby and Gladstone Parks are not being accounted for in the analysis, and the AAC reduced accordingly.

Roads, Trails and Landings

The joint submission says the right-of-way widths used to calculate the loss of productive land to roads are too narrow. The groups recommend a 20-metre width for secondary roads and a 16-metre width for logging roads, for both existing and future roads. This submission also maintains roads should not be removed from the productive forest but remain part of the forest land base and be considered permanently early seral.

P&T's submission says allowances for roads and trails appear reasonable, but the netdown for landings is high based on their experience. The company states agreement that future road allowances will start declining as the TSA is accessed and says this pattern must be accurately reflected and described in the analysis.

The joint submission says that regardless of the requirement to rehabilitate skid trails, some degree of detrimental soil disturbance will occur. They say assuming no disturbance is not realistic and suggest another two to three percent netdown to account for productivity lost to trails.

Existing Forest Inventory

Two submissions express concern about the on-the-ground forest inventory as the *Data Package* does not provide actual figures, but only estimates and projections.

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Expected Rate of Growth

P&T says genetic improvement programs are expected to result in significant yield improvements and these should be reflected in the base case, as should Old Growth Site Index (OGSI) adjustments.

Two submissions question the growth rates expected for managed stands and say tree plantations across the province are not performing as expected. The submissions note problems with forest health and wood quality and strength. They say if increased yields should occur, they should accrue to future generations and not be counted as current gains.

The joint submission says the operational adjustment factor (OAF 2) used to account for volume losses to diseases and pests should be increased to 25 percent, noting that recent studies show 20 percent losses just due to root disease.

Regeneration Factors

P&T requests clarification on how the age of plantation stock is considered in calculating regeneration delay. The joint submission says assumptions about the treatment of backlog "not satisfactorily restocked" (NSR) areas appear to be overly optimistic given recent budget cuts and reductions in Forest Renewal funding.

Silvicultural Systems

Two submissions question how partial cutting and uneven-aged management will be modelled in the analysis and note a lack of information on this in the *Data Package*.

Two other submissions say that unless the Forest Service is committed to harvesting the Boundary TSA into economic and ecological collapse, it is imperative that ecosystem-based, alternative systems be modelled in the base case, not as an alternative to but as a replacement for clearcutting.

P&T requests clarification how the Fire Maintained Ecosystem Restoration program will be modelled.

Visual Quality

The joint submission notes that visual quality maps are described as draft in Table 3, yet the district manager's 1999 forest development plan (FDP) letter instructs licensees to use them. These areas should be included as part of the base case as in other Kootenay TSAs, rather than just a sensitivity analysis, according to this submission.

Wildlife

The Kettle Range Conservation Group says the harvest level should reflect the needs of seclusion-dependent species (marten, lynx, caribou, elk and grizzly) and species dependent on clean, cold waters such as salmon and bull trout. The group says that since Canada does not have protective legislation for imperiled species, many of which cross the border from the U.S. where they are protected, they should be given priority at the local level.

The joint submission notes that Identified Wildlife Measures that are provincial policy are not mentioned, and maintains that a land base reduction of one to two percent is needed to account for Wildlife Habitat Areas.

Six submissions comment on grizzly bear management as it affects the Timber Supply Review. P&T expresses the opinion that since the development of recovery strategies is still at an early stage, it would be premature to consider the potential impacts as part of the base case.

The other five submissions maintain that current and potential timber constraints due to the protection of grizzly bears should be included in the base case. Some of the key points made in these submissions are:

- Dr. Brian Horejsi's report (*The Endangered Granby-Gladstone Grizzly Bear Population – A Conservation Biology Analysis for Recovery*) should be modelled in the base case.
- access guidelines, as contained in the 1999

FDP letter, should be considered as current practice and modelled in the analysis.

- maintaining all existing roadless areas and large, connected security zones is crucial to preserve a corridor between the two parks and to prevent the Granby area being cut off from the Arrow Lakes area.
- reduction of road densities in roaded areas should be modelled or tested in a sensitivity analysis.
- the compartment system of alternate drainages around Granby Park is ineffective as non-active periods are too short. Scientific data says non-active periods of at least 30 to 35 years should be modelled.
- modelling should look at harvest scheduling options that would control access and maintain low road densities in the most important habitat over the long term.

Riparian Areas and Watersheds

The joint submission says high value fish streams should include the reaches and sub-basins of the Kettle and Granby Rivers that provide habitat for red- and blue-listed non-game fish. The groups also question how small unmapped streams are accounted for in the analysis, and note the conclusions of the Riparian Management Audit (Beaudry *et al*) that riparian management guidelines may have a larger impact than identified in the *Data Package*.

Two submissions say water is one of our most precious life-sustaining resources and the precautionary principle must be applied. They say terrain stability analyses and maximum stream buffers must be modelled in the base case for all watersheds.

P&T says they support a sensitivity analysis for watershed management guidelines, but say inclusion in the base case would be premature since identification of specific watersheds is still at an early stage.

The joint submission says the green-up height of nine metres is insufficient, noting that recent research is beginning to indicate that full hydrologic green-up occurs later. They suggest use of 11 metres. The groups also say a 30-percent equivalent clearcut area (ECA) is very high for community watersheds and that 20 percent is more reasonable.

Stand Level Biodiversity

P&T says the assumption that only 50 percent of wildlife tree patch (WTP) requirements will be met outside the harvesting land base has no documented rationale and is overly conservative.

The joint submission says the WTP retention numbers are too low, and that Table 20(b) in the *Biodiversity Guidebook* should be used because landscape level biodiversity emphasis options (BEOs) have not been established. The groups also say the assumption that WTPs will be larger than two hectares and contribute to meeting seral stage requirements is not realistic, noting that other TSAs (e.g., Kootenay Lake) assume as few as 10 percent of WTPs will be that large.

Landscape Level Biodiversity

P&T says the example calculations in Section 6.4.1 imply that old-seral requirements must be achieved by the beginning of the third rotation rather than at the end as stated in the *Biodiversity Guidebook*. The company requests clarification.

Two submissions say the current approach will lead to the disappearance of old-growth forests from all valley bottom areas outside of parks and ask that the analysis model old-growth retention at any given time (not one-third at a time) and ensure representative retention outside inoperable areas.

The joint submission makes a number of points on this issue, including:

- the 1999 FDP letter instructs licensees to use interim landscape units and BEOs and

therefore these should be modelled in the base case.

- forest cover requirements should also reflect full implementation of mature+old.
- protected old and mature were already counted once in setting cover requirements and should not be double-counted in the analysis.
- the assumption that stands in the non-contributing land base will age over the duration of the analysis horizon is completely unrealistic.

Non-Recoverable Losses

The joint submission recommends a sensitivity analysis on the potential impacts of climate change on increasing beetle populations, root rot and potential for catastrophic fires.

Socio-Economic Factors

The joint submission says the Timber Supply Review should include an environmental risk analysis of the various harvest projections, as this also relates to the social and economic objectives of the province.

Two submissions say the statement that the economy of the Boundary TSA depends on forestry is objectionable, given the 1996 census data and the extent of taxpayer subsidization of the industry. They say the trend is away from forestry-based employment and that tourism is the fastest growing industry. Another submission says as the TSA increasingly becomes a tourism and retirement destination, maintaining other social and economic values should be given greater weight. The Kettle Range Conservation Group says parks and wilderness areas support jobs for the long term, unlike forestry development.

The Forest Economic Development Officer says the transition to secondary manufacturing has just begun and notes the importance of trading relationships between the primary licensees and small business. She says one of the best opportunities for investment results from wood being available through the Small Business Program.

An individual submission makes three recommendations:

- reflect the complete economic base in describing the economy.
- examine the short- and long-term implications of alternative cut rates on the entire economy.
- involve the ministers of health, small business, women's equality and environment in establishing economic and social objectives.

Timber Supply Area Analysis Report

Land Base Factors

One submission says it is not logical to reduce the THLB by the area of trails and landings since they do become naturally regenerated or can be planted, and the effect would simply be a reduction in site class. The Ministry of Environment (now Ministry of Land, Water and Air Protection) submission (MoE) says roads should be considered early seral, and not be deducted from the THLB. The ministry also questions the road widths used, saying they do not reflect reality.

Expected Rate of Growth

One submission suggests the discussion about the likely underestimation of site index in dense lodgepole pine stands probably also applies to pine stands severely infected with dwarf mistletoe which are particularly common in the northwest part of district. This individual questions if there are not useful correlations between ecosystem type and site index that could be used instead of tree measurements in old, diseased and dense stands.

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The Granby Wilderness Society (GWS) makes several points on this topic:

- they agree with treating the results of the Old Growth Site Index study as unproven theory.
- the growth curves used in managed stands (TIPSY) are unsubstantiated for this area and are overly optimistic.
- OAF2s are not realistic.
- the minimum harvestable age should be culmination age.

Not Satisfactorily Restocked Areas

The GWS says that given the uncertainty about funding for silviculture work, less optimistic assumptions about the rehabilitation of backlog NSR areas should be used.

Wildlife

The GWS says the base case should include strategies for the recovery of the numerous red-listed species in this TSA, such as ECA management and increased sediment control in the various sub-basins of the Kettle River where red-listed fish species occur.

The North Okanagan Naturalists' Club notes that two species-at-risk listed in Table 1 of the report do not occur in this TSA: the long-billed curlew and the ferruginous hawk. An individual submission says ungulate winter range (UWR) should be treated by burning or selective logging, while MoE says the forest cover guidelines for UWR in the Kootenay-Boundary Land Use Plan (KBLUP) should have been modelled.

Grizzly Bear Management

Seventeen submissions, including one co-signed by 60 individuals, comment on the issue of grizzly bear management and recovery strategies. The following are the key comments:

- reserves should be selectively logged to increase small mammals and berries, which are grizzlies' chief food.
- high emphasis biodiversity designation in the area between the parks should be re-established, as indicated in the original KBLUP recommendations.
- significant reserves to provide connectivity and buffers on avalanche tracks, riparian areas, wetlands and other key grizzly habitats should be allowed for.
- a moratorium on the extension of roads and logging into the remaining roadless areas in the recovery area is requested.
- the massive network of logging roads in the area fragments and degrades habitat, and provides access to illegal hunters.
- Dr. Horejsi's strategy, which stresses the need for zero mortality, a network of security areas and a drastic reduction in AAC and roads, should be implemented and modelled.

Horejsi's submission also suggests the chief forester should recommend to the minister of forests that all roadless land in the TSA be "designated areas" to provide security of biological processes and life for all wildlife, but specifically for the Granby grizzly.

Watersheds

The GWS says the minimal cover constraints indicated for community watersheds do not reflect the ECA recommendations that normally result from watershed planning processes. The society says similar cover constraints should apply to all domestic watersheds, and constraints for high value fisheries watersheds and those containing red- and blue-listed species should also be considered.

Biodiversity

The GWS says Figure 24 of the *Analysis Report* shows that some of the THLB will be needed to contribute to meeting seral stage targets for mature and old in the future. As well, the society says another downward pressure results from the fact that much of the inoperable and park areas in

the TSA are dominated by dry, rocky sites and do not meet the representation goals required to meet biodiversity objectives. Given the limited extent of remaining old forests, the harvest forecast should consider the need to reserve all of these stands, including those in the THLB, according to this submission.

The MoE submission expresses the opinion that modelling continuous aging in the non-contributing land base will not work.

Non-Recoverable Losses

The GWS says the very low OAFs used in the base case do not adequately account for a reasonable projection of losses, especially given climate change. Fire control and salvage may limit disturbance losses to some extent, but they generally have limited effect on larger stochastic events.

Mill Requirements

P&T says although their mills have not been operating at full capacity, the opportunity to acquire more timber will increase the likelihood of continuous operation, especially with the demise of the Softwood Lumber Agreement. More reductions could be devastating for people who rely on the forest industry, says P&T.

Canpar Industries says its particleboard plant depends on residues from local sawmills and they are exploring a trade arrangement with P&T (trading logs for sawdust and shavings) which would require a secure, long-term timber supply for Canpar.

Socio-Economic Impacts

The GWS says it is prudent to begin to reduce the harvest level now to allow for community adjustment, given that long-term community economic stability and sustainability, and minimization of adjustment costs are the cornerstones of the Crown's objectives.

A petition signed by 27 people and four other submissions say the socio-economic analysis is flawed and overlooks:

- the significant subsidization of the forest industry.
- the forest industry's depletion of natural capital with severe long-term implications.
- the environmental degradation resulting from industry forestry, with unaccounted economic costs.
- that maintaining an inflated harvest allows industry overcapacity and inefficiencies to continue, and delays the transition to more diversification and value-added products.
- lost economic opportunities (tourism fishing, hunting, recreation, etc.).

The Village of Midway says that community is very heavily dependent on forestry for jobs and an industrial tax base.

P&T says polling done regarding the higher level plan showed that over 70 percent of people believe jobs and economic development are a priority. This indicates that economic growth is a significant issue for the majority of people, versus the vocal minority, according to this submission.

Other Comments

Many submissions commented on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Timber Supply Review Process

Fifteen submissions comment on the Timber Supply Review (TSR) process itself. These comments include the following:

- the TSR does not provide full accounting of the costs of the timber maximization policy, such as loss of biodiversity, species extinction, climate change, erosion, loss of economic opportunities and community insecurity. Similarly, there's no full cost accounting of the ecological services performed by forests.

- there is a visible bias to minimize the modelling of factors that may have a downward pressure on timber supply, which is evident by comparing assumptions used in other TSAs. Examples are provided.
- the GWS says various management issues raised in the rationale statement for the previous TSR have not been resolved, indicating the need for a more conservative harvest flow. Examples are provided. P&T says the Forest Service has done an excellent job in addressing issues raised in the last review.
- the ministry's refusal to participate in a public forum in November is protested.
- the ILMA says, after nine years of involvement in the TSR program, the Boundary *Analysis Report* is one of the better ones they have reviewed.
- the TSR does not allow for Code implementation, reduced area due to parks, Special Management Zones adjacent to parks, or for a Grizzly Bear Recovery Strategy.
- the analysis fails to address key issues and is in violation of Section 8(8) of the *Forest Act*. It is deficient in science, biased and prejudicial to the interests of B.C. and British Columbians. Details are provided.
- comments on the *Data Package* seem to have been ignored in the analysis
- validity of the TSR is questioned, given the frequent use of words like estimated, forecasts, anticipated, etc.
- the TSR is driving future forest practices; what is actually current should be used in the base case with the assurance TSR will not drive operations.
- "abnormal devastations" should include clearcutting and intensive roadbuilding not just acts of nature.

Management

Seventeen submissions comment on management practices or approaches. These comments include the following:

- the current rate of production can probably not be sustained because management practices allow for the consumption of natural capital through the conversion of natural forests to fibre farms.
- it is time the Forest Service adopted ecosystem-based forestry rather than volume-based management, given the growing consumer demand for eco-certified wood products.
- the district should look to restoration of damaged lands.
- by limiting our future forest base to economic monoculture, we devalue our resource and severely limit our options.
- selective and individual tree cutting is the way to go for long-term job gain and environmental protection.
- do not implement the higher level plan.
- restore the ecological integrity of special management zones.
- ban the export of raw logs.
- management that means tremendous waste on landings, more clearcuts, less clean water, less fish and fewer forest workers than ever before is abuse of our land and resources, and the people who depend on them.

Harvest Levels

Most submissions express an opinion on the preferred harvest level. Thirty-six individual submissions and a petition signed by 27 persons support a reduced AAC. Forty submissions, including 14 form letters, support a drastically reduced AAC, as does a letter co-signed by 60 persons. The following reasons are given:

- to allow recovery of biodiversity and natural ecological processes.
- because of uncertainty about new and better information, and the recurrent theme of uncertainty in the data.
- to protect roadless areas for fish and wildlife needs, for their biological legacy, and for their contribution to combating global climate change.
- the large number of red- and blue-listed species indicates that harvesting and other human disturbance has reached an unsustainable level.
- to protect Granby Grizzly habitat, allow recovery of ecosystems and grizzly bears, and protect biodiversity.
- proposed rates of logging are in violation of international accords, such as the Convention on Biological Diversity, and will impede forest certification.
- maintaining or increasing the cut discourages diversification and promotes the status quo of low return and low employment for each tree cut.
- keeping it high imposes unacceptable costs on First Nations and exposes the Crown to potential liability for compensation for infringement on aboriginal rights.
- more clearcuts will affect quality of air and quantity of clean water.
- to allow tourism industry to develop.
- the market will be overloaded with beetle harvest for some time, keeping lumber and log prices very low.
- projections of future wood volumes are worrisome when existing plantations are in such poor condition.
- the level of subsidization of the industry.
- the value of high quality wood, produced in a sustainable manner, will steadily rise.
- it will be harder to reduce the AAC once it is increased, if that were required.

A petition signed by 27 persons, as well as several individual submissions, express dismay at the increase in the long-term harvest level (LTHL). They say the increase is based on anticipated gains in yields from plantations and maintain this is full of uncertainty. Should these gains occur, these submissions say, they should accrue to future generations.

Sixty-nine submissions express support for an increase in the AAC and the increased LTHL. These submission include 59 form letters and individual letters from the ILMA, the MP, the village of Midway and the cities of Grand Forks and Greenwood. The following reasons are given:

- to increase the economic stability of the area, providing stable jobs and tax base.
- to meet the timber supply objective of the higher level plan, given uncertainty in other parts of the Nelson region.

Appendix 1

Submissions received by the Boundary Forest District

Submissions received on the Data Package

Forest industry

Pope & Talbot, Forestry Manager

Interest groups

Friends of the Granby Environmental Society
Granby Wilderness Society
Granby Wilderness Society & Friends of the Granby Environmental Society (joint)
Kettle Range Conservation Group

Local government

Forest Economic Development Officer, Boundary Economic Development Commission

General public

Four individual submissions

Submissions received on the Timber Supply Analysis Report

Forest industry

Pope & Talbot (2 submissions)
Transwest Timber
Bell Pole
Interior Lumber Manufacturers Association
Canpar Industries
Boundary Woodlot Association
Federation of BC Woodlot Associations

Consultants

Marshall Forestry Services

Local government

Village of Midway
City of Grand Forks
City of Greenwood

Member of Parliament

MP Kootenay-Boundary-Okanagan

Government agencies

Ministry of Environment, Lands and Parks, Forest Ecosystem Specialist

Interest groups

Granby Wilderness Society (3 submissions, one of which is co-signed by 60 people)
Boundary Naturalists
North Okanagan Naturalists' Club

General public

144 individual submissions (including 76 form letters)
one petition with 27 names